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## PRIVACY POLICY

WE HAVE CREATED THIS PRIVACY POLICY BECAUSE WE HIGHLY VALUE YOUR PERSONAL DATA. THIS PRIVACY POLICY INCLUDES IMPORTANT INFORMATION IN RESPECT TO YOUR PERSONAL DATA.

### Privacy statement

Kramer Electronics Ltd. and its affiliated corporations ("**Kramer**" or "**we**") develops, manufactures and markets video, audio and control products, solutions and services (the "**Products**"). Kramer also creates and operates various websites (the "**Websites**").

THIS PRIVACY POLICY REFERS TO THE PRODUCTS AND THE WEBSITES AND RELATES TO KRAMER'S CUSTOMERS, POTENTIAL CUSTOMERS, END-USERS WHO ACQUIRE PRODUCTS, KRAMER'S EMPLOYEES AND SERVICE PROVIDERS AND USERS OF THE WEBSITES.

This Privacy Policy sets forth Kramer's policy with respect to any information relating to an identified or identifiable natural person. ("Personal Data"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. "Personal Data" and identifiable natural person are as defined in the General Data Protection Regulation (GDPR) (EU) 2016/679. "Non-Personal Data" is therefore any information that does not relate to an identified or identifiable natural person.

The limitations and requirements in this Privacy Policy relate only to our gathering, use, disclosure, transfer and storage/retention of Personal Data, but do not apply to Non-Personal Data.

### Data that we use, receive, collect, process or store and how we use it:

Using, receiving, collecting, processing or storing Personal Data is not our primary purpose. Kramer uses, receives, collects, processes or stores only Personal Data necessary to provide the Products and operate its business.

However, in the course of running our business, we might use, receive, collect, process or store Personal Data relating to potential and actual customers, service providers, suppliers, employees, users of the Websites and others.

This Personal Data may include:

- names, telephone numbers, email addresses, addresses, contact details, financial information (i.e. billing information, bank account information, credit card information), social network contact accounts, employee's health information, employee and candidate CVs and other information
- information as to how the Products and the Websites are accessed and used including information such as computer IP addresses, browser types or versions, the pages of the Website that a user visits, the times and dates of visits, the time spent on each page, unique device identifiers and other diagnostic data.

We use cookies and similar tracking technologies to track the activity on our Product and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Products. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Products. Examples of cookies we use:

- **Session cookies** – for operating our Products.
- **Preference cookies** – for remembering your preferences and various settings.
- **Security cookies** – for security purposes.

We may use Personal Data as follows:

- **Processing and analyzing:** in order to provide the Products and conduct its business, Kramer may use Personal Data for processing and analyzing purposes. For example, we use cookies to personalize your website experience, improve the Websites, improve customer service and administer promotions, surveys, or other site features.
- **Certain purposes:** if you provide Personal Data for a certain purpose, Kramer may use the Personal Data in connection with the purpose for which it was provided. For instance, if you contact Kramer by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to the email address from which the contact came.
- **Internal business purposes:** we may use your Personal Data for internal business purposes, including helping us improve the content and functionality of the Websites to better understand our Customers and Users, to improve our services, to protect against, identify or address wrongdoing, to enforce our Contracts and this Privacy Policy, to provide you with customer service, and generally to manage and operate our business (e.g. pay salaries and amounts owing to suppliers and service providers).
- **Marketing purposes:** Personal Data provided to us by you may be used by us to contact you in the future for our marketing and advertising purposes, including informing you about new Products we believe might be of interest to you and developing and delivering promotional or marketing materials. If by mistake you receive direct marketing without your specific consent or wish to opt-out, please contact us at [DPO@KramerAV.com](mailto:DPO@KramerAV.com).
- **Statistics:** Personal Data provided to us by you may be used by us for statistical reports containing aggregated information.
- **Security and dispute resolution:** we may use Personal Data to protect the security of our Websites

and Products, to detect and prevent cyber-attacks, fraud, phishing, identity theft, data leakage, to confirm the validity of software licenses, to resolve disputes and to enforce our agreements.

- **Data Retention, archives:** we retain and archive Personal Data as long as necessary to operate our business and provide Products, to meet our contractual obligations and law and regulations - subject to our retention policies and this Privacy Policy.
- **Transfer, sharing and disclosure:** we may share your Personal Data with our partners, contractors and service providers who process Personal Data on Kramer's behalf to perform certain business-related functions. When doing so, we ensure that they are bound to maintain the Personal Data in accordance with this Privacy Policy.
- **Cloud products:** we may need to share Personal Data with our cloud service providers. For example, to assist Kramer in maintaining and securing the Websites or providing its Products, cloud service providers may require access to Personal Data. In such cases, we ensure that our cloud service providers are bound to maintain the Personal Data in accordance with this Privacy Policy.
- **Development and customer service team:** we may need to share Personal Data with our development and customer service team. For example, to provide customer service and support or to assist in protecting and securing our systems and services, our development and customer service team may have access to Personal Data. In such cases, we ensure that our development and customer service team is bound to maintain the Personal Data in accordance with this Privacy Policy.
- In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of Kramer (or its assets) will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.
- We may disclose your Personal Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the Products, (d) act in urgent circumstances to protect the personal safety of users of the Websites and Products or the public, or (e) protect against legal liability.
- **Other Purposes:** If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time the Personal Data is processed.
- **Non-Personal Data:** Since Non-Personal Data cannot be used to identify you, we may use such data in any way permitted by law.

## How we store information and transfer it.

- We use third parties' cloud services such as:
  - Microsoft office 365
  - Kramer stores all data which been collected by the Websites on Microsoft AZURE cloud services. For Microsoft Azure Privacy policy and TOU please refer to <https://azure.microsoft.com/en-us/support/legal/>. Kramer's primary database storage location is in Europe.
  - Salesforce cloud services which will comply with the GDPR in the delivery of their services, certify compliance with the EU-U.S. Privacy Shield Framework and is ISO 27001, 27017,27018 certified (for Salesforce full statement see <https://www.salesforce.com/eu/campaign/gdpr/>).

- Personal Data may be processed by third party service providers. We transfer to such providers only the minimum data that is necessary for conducting our services. The data is transferred only to suppliers approved by us that allow compliance with the GDPR.
- Personal Data may be transferred stored and processed in countries outside the EU or European Economic Area (EEA). Such transfer to third countries may include countries that do ensure the same level of data protection laws as required by EU privacy laws. In such cases, we implement information security techniques and technical measures or third parties' contractual obligations to maintain such Personal Data at the same security level as other Personal Data that Kramer administers.
- We may transfer Personal Data to Israel and maintain it there. Kramer's headquarters are in Israel. Israel's data protection law is considered by the EU as adequate.

## Security of Personal Data

- We are strongly committed to the protection of your Personal Data, and we will take commercially reasonable technical steps, of the sort commonly accepted in our industry, to keep your Personal Data secure and to protect it from loss, misuse or alteration. However, no network, server, database, Internet or e-mail transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you disclose.
- If you notice a risk or any security violations, we please report to us on [DPO@KramerAV.com](mailto:DPO@KramerAV.com), so that we can attempt to resolve it as soon as possible.
- We recommend that you use, disclose and share your Personal Data with caution and don't give out Personal Data unless it is necessary, as we cannot guarantee the security of data over the Internet and cannot control actions of other users of the Products with whom you choose to share Personal Data.
- Kramer implements legal, technical and organizational information security measures, based on the ISO certification mechanism method of ISO 27001:2013 - Information Security Management System and ISO 27017:2015 -Information security controls for cloud services and ISO 27018:2014- - Code of practice for protection of personally identifiable information (PII) in public clouds acting as PII processors.

## Access, updates, corrections, deletions, restrictions. Complaints with supervisory authority.

- You may have the right to request access to some of your Personal Data being stored by us; you can also ask to correct, update or delete any inaccurate Personal Data that we process about you – all are subject to our policies and to applicable law and regulations. In order to exercise these rights, please contact us at: [DPO@KramerAV.com](mailto:DPO@KramerAV.com).
- We may retain your Personal Data for any period permitted or required under applicable laws. Even if we delete your Personal Data it may persist on backup or archival media for an additional period of time due to technical issues or for legal, tax or regulatory reasons or for legitimate and lawful business purposes.
- You may have the right to restriction of processing if one of the following apply:
  - The accuracy of the Personal Data is contested by you;
  - Unlawful processing has occurred and you object to deletion of the Personal Data and requests restriction of its use instead;
  - Your service provider no longer needs the Personal Data for the purposes of the original processing, but the data is required by you for the establishment, exercise or defense of legal claims;

- You have objected to processing pending verification whether the legitimate grounds of your service provider override yours.

If you wish to object to processing, please contact us at [DPO@KramerAV.com](mailto:DPO@KramerAV.com).

- If you have the right to lodge complaints with supervisory authorities, we would appreciate your contacting us first in order to solve the issue for the benefit of all parties. Please contact us by email to [DPO@KramerAV.com](mailto:DPO@KramerAV.com). Our supervisory authorities are the Israeli, German and French data protection authorities.

## General

- This Privacy Policy applies only to Personal Data that you provide to us.
- This Privacy Policy applies only to the Products and Websites. It does not apply to third party's websites or services, even if they link to our Website or Products. The existence of a link from a third party's website or services does not imply that we endorse or have reviewed the third-party's websites or services. We suggest contacting such third parties directly for information on their privacy policies.
- You provide Personal Data to us consensually either on a case by case basis or in a broader contractual context.
- We will use your Personal Data in a manner that is consistent with this Privacy Policy and applicable law and regulations.

## Changes in terms

- The Products and our business and the regulatory environment in which they function may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right, in our sole discretion, to update or modify this Privacy Policy at any time. Modifications to this Privacy Policy will be posted to the Websites with a change to the "Last updated" date at the top of this Privacy Policy.
- Please review this Privacy Policy periodically, and especially before you provide any Personal Data or information. This Privacy Policy was last updated on the date indicated above. Your continued use of the Products following the effectiveness of any modifications to this Privacy Policy constitutes acceptance of those modifications. If any modification to this Privacy Policy is not acceptable to you, your sole remedy is to cease accessing, browsing and otherwise using the Websites or our Products.

## Dispute Resolution

- If you have a complaint about Kramer's privacy practices, please write to us at: [DPO@KramerAV.com](mailto:DPO@KramerAV.com). We will work with you to attempt to resolve your complaint.
- The laws of the State of Israel govern this Privacy Policy. The competent courts in the district of Tel Aviv in Israel have exclusive jurisdiction with regard to any dispute that may arise in connection with this Privacy Policy.

IF YOU BELIEVE THAT KRAMER HAS NOT MET ANY OF THE PROVISIONS OF THIS PRIVACY POLICY, PLEASE INFORM KRAMER AS SOON AS POSSIBLE BY SENDING AN EMAIL TO: [DPO@KRAMERAV.COM](mailto:DPO@KRAMERAV.COM).